UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
)
VS.) Case No.: 4:14 CR 88 RWS (SPM)
)
DIONNE GATLING, et al,)
)
Defendant.)

DEFENDANTS' AMENDED JOINT EXHIBIT LIST FOR FRANKS HEARING

COME NOW Defendants, by and through counsel, and respectfully submits the following Amended Joint Exhibit List for the *Franks* hearing.

Exhibit	Description	Admitted
A	Supplemental Discovery Provided by Government 5/7/2015	X
В	Transcripts of Interviews and Reports from Investigating Agency (Batch 4) 2/2016	X
B-1	Sworn Statement of TFO DA to OPR on August 7, 2014	X
B-2	3/30/12 – Voucher for CS#1	X
B-3	5/2/12 – Voucher for CS#1	X
B-4	2/6/13 – Voucher for CS#1	X
B-5	7/2/13 – Voucher for CS#1	X
С	Transcripts of Interviews from Investigating Agency (Batch 5) 4/5/2016	X
D	Transcripts of Interviews from Investigating Agency (Batch 6) 4/28/2016	X
Е	Transcripts of Interviews from Investigating Agency (Batch 7) 7/19/2016	X
F	JH Notes and Affidavit of CS1 (Batch 8) 10/12/2016	X

G	Ex Parte Document Relating to K.C. (ECF 325-1) 10/14/2016	X
Н	Norcross Police Department Documents relating to David A. 10/14/2016	X
H-1	Email from AUSA & Norcross Police Department Internal Investigation Re: David A.	X
I	Administrative Appeal of K. Cromer	X
J	CS1 Email to Dean Hoag on October 11, 2016 (ECF 321-1)	X
K	Bankruptcy Filing of CS1	X
L	DEA Agents Manual	X
M	CS#1 Handwritten Pay Sheets	X
N	BOP payments and jail visit log of CS1	X
О	August 8, 2012 DEA 103 and related documents	X
P	August 6, 2013 DEA 6 - Case Initiation Sheet	X
Q	Government Redacted Affidavit	X
R	Cromer Suspension Notice dated June 5, 2015	X
S	Not used	
Т	Not used	
U	Not used	
V	2012 Calendar	X
W	10/18/11 – Voucher for CS#1	X
X	8/5/12 - Form 499 – Award	X
Y	Affidavit of Sgt. Tyler Hooks	X
Z	Text messages of CS#1 (sealed)	X
AA	1/26/12 – Voucher for CS#1	X
BB	10/18/11 – Voucher for CS#1	X

CC	11/29/11 – Voucher for CS#1	X
DD	Keith Cromer – Standards of Conduct forms	X
A. Rush-	DEA Chapter 6	X
Gibbs-1	Keith Cromer photo	X
Gibbs-2	Keith Cromer photo with meta data	X
Gibbs-3	Cromer Sprint call data for 8/5/12	X
Gibbs-4	Google Map – Newberry, SC to McDonough, GA	X
Gibbs-5	American Express statements – Cromer 8/5/12	X
Gibbs-6	Not used	
Gibbs-7	Not used	
Gibbs-8	Not used	
Gibbs-9	8/5/12 relevant phone activity (Enlargement of Govt. Ex. B with numbered calls)	X
Gibbs-10	Summary of 8/5/12 relevant phone activity	X
Gibbs-11	AT&T Records of CS#1	X
Gibbs-12	AT&T Codes	X
Gibbs-13	Chart of 8/5/12 phone events	X
Gibbs-14	Deposition of CS#2	Supplemental

Respectfully submitted,

BY: /s/ JoANN TROG

Attorney for Defendant Dionne Gatling 121 West Adams Avenue St. Louis, Missouri 63122 (314) 821-1111 Jtrogmwb@aol.com

BY: /s / ROBERT HERMAN

Attorney for Defendant Andre Rush 8820 Ladue Road, Suite 201 St. Louis, Missouri 63124 (314) 852-0200 bherman@laduelaw.com

BY: /s/ PRESTON HUMPHREY, JR.

Attorney for Defendant Timothy Rush 1015 Locust Street, Suite 413 St. Louis, Missouri 63101 (314) 621-1765 phumphrey@phlawstl.com

BY: /s/ STEPHEN R. WELBY /s/ THOMAS GABEL

Attorney for Defendant Gibbs Federal Public Defender Office 650 Missouri Ave., Suite G-10A East St. Louis, IL 62201 (618) 482-9050 Steve_Welby@fd.org Thomas Gabel@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2017, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/S/ Stephen R. Welby